

HD
7303
.C22
S38
1970b
IGSL

Blanchfield

INSTITUTE OF GOVERNMENTAL
STUDIES LIBRARY

JAN 12 2006

UNIVERSITY OF CALIFORNIA

HOUSING SPACE STANDARDS



SANTA CLARA COUNTY



Digitized by the Internet Archive
in 2026 with funding from
State of California and California State Library

<https://archive.org/details/C094825233>

~~2005~~
~~0795~~
HD7303
. C22
S38
1970b
IGSL

HOUSING SPACE STANDARDS



SANTA CLARA COUNTY

The Joint Cities-County Housing Element Program:

CITIES:

Campbell
Cupertino
Gilroy
Los Altos
Los Altos Hills
Los Gatos
Milpitas
Monte Sereno
Morgan Hill
Mountain View
Palo Alto
San Jose
Santa Clara
Saratoga
Sunnyvale

COUNTY OF SANTA CLARA

PLANNING POLICY COMMITTEE OF SANTA CLARA COUNTY (PPC)

Campbell	Councilman William R. Podgorsek
Cupertino	Commissioner Frank Klein
Gilroy	*Councilman Jerry J. Fitzgerald
Los Altos	Commissioner Jack Hirshon
Los Altos Hills	*Councilman Mark E. Kennedy, Jr.
Los Gatos	*Commissioner William Childers
Milpitas	*Councilwoman Lee Lynch
Monte Sereno	Commissioner George A. Gillespie
Morgan Hill	Councilman Stanley Grabowski
Mountain View	Commissioner Thomas P. McReynolds
Palo Alto	Councilwoman Ruth Cannon
San Jose	*Commissioner Frank Treseder
Santa Clara	*Councilman W. D. Weisgerber
Saratoga	*Commissioner George B. Snodgrass
Sunnyvale	Councilman S. C. Dorman
Santa Clara County	Commissioner Richard G. Lorraine
	Councilman Joseph Galvan
	Commissioner Spencer Parker
	*Councilman Charles Gordon, Chairman
	*Commissioner Albert C. Gribaldo
	Councilman Dr. William H. Clark
	Commissioner Mary Gordon
	*Councilman Kurt Gross
	Commissioner Roy Naylor
	Councilman William P. Kiely, Jr.
	Commissioner Thomas N. Fast
	*Councilman Jerome A. Smith, Vice Chairman
	Commissioner Henry J. Kraus, Jr.
	Councilman Charles H. Hefferlin
	Commissioner Robert Flohr
	*Supervisor Ralph H. Mehrkens
	*Commissioner Warren B. Heid
*Member of Executive Committee	

SANTA CLARA COUNTY ASSOCIATION OF PLANNING OFFICERS (SCCAPO)

Campbell	Arthur A. Kee
Cupertino	James Sisk
Gilroy	Mary Jo Hayes
Los Altos	Vernon Gomes
Los Altos Hills	William Spangle & Associates (Consultant)
Los Gatos	Robert Davis
Milpitas	James P. Connolly, Chairman
Monte Sereno	Thomas B. Inglis, Jr.
Morgan Hill	Leslie Doolittle
Mountain View	Robert S. Lawrence
Palo Alto	Louis J. Fourcroy
San Jose	Sanford Getreu
Santa Clara	Fred Carlson
Saratoga	Stan Walker
Sunnyvale	Edward C. Moore
County of Santa Clara	Roy Cameron, Vice Chairman

SANTA CLARA COUNTY

BOARD OF SUPERVISORS

Victor Calvo, Chairman
Dominic Cortese
Ralph H. Mehrkens
Charles A. Quinn, Sr.
Sig Sanchez

Roy S. Cameron, Director of Planning

PLANNING COMMISSION

Lawrence E. Anderson, Chairman
Warren B. Heid, Vice Chairman
Anthony J. Grcich
Oscar H. Liebert
N. C. Mirassou
Edward A. Teresi
Vacant

ADVISORY COMMITTEE ON HOUSING

DISTRICT 1. Commissioner Frederick J. Pflieger
DISTRICT 2. Commissioner Thomas N. Fast
DISTRICT 3. Councilman W. D. Weisgerber, Chairman
DISTRICT 4. Commissioner Frank Treseder
DISTRICT 5. Councilman Mark E. Kennedy, Jr.

Rev. Kenneth Bell
John Brezzo
John Burns
Mary Charles
James P. Connolly
Allen DeGrange
Dr. John DeHeras
Richard B. DeLong
Carl S. Eklund
Dorothy Ellenburg
Robert S. Fenley
Dr. Frank Fiscalini
Louis R. Goldsmith
Don H. Goodman
Walter Gray
Ira Hall
Tom Harrington
Vernon G. Hazen
Bill Herman
Louis G. Juarez
Kenneth Karstens

Ken Kennedy
John Lisher
Jing Lyman
Don Mackay
Elsie Martinez
John Mercer
Bob Moulton
Jim O'Brien
Brian Paddock
Lowell Pannell
Al Perez
Kenneth Root
Leo Ruth
Louis A. Schulte, Jr.
Howard Schwartz
Dr. Ted Sielaff
Alice Smith
Olney Smith
Frank Valanzuela
Joe Vasquez
George H. Williamson, Jr.

JOINT CITIES-COUNTY HOUSING ELEMENT PROGRAM STAFF

Franklin M. Lockfeld, Senior Planner
Bruce Freeland
Ruth Friedlander
Isao Kobashi

Clifford Marks*
Juan Vigil
Tyr Johnson, Consultant

*Summer 1970

HOUSING SPACE STANDARDS FOR LOW AND MODERATE INCOME FAMILIES

INTRODUCTION:

Housing space standards have long been of concern to persons dealing with low income families in America and Europe because of the many problems associated with overcrowding. Public health officials, educators and social workers have all been concerned about housing standards, particularly "room space", since it is central to many other problems. It is paradoxical that overcrowding of housing space can occur despite the existence of minimum space standards, because actual occupancy at any one time or continuously can exceed the original design intent. Nonetheless, some minimum public standard is necessary to establish minimums permissible for new construction or rehabilitation of housing lest a kind of "Greshams Law" of housing operate through the avarice and cupidity of builders attempting to reduce total cost by reducing room size to an unacceptable level from a public standpoint. To put it very simply, space is cost; and cost is the paramount factor in the purchase or renting of housing. Many other factors affect a buyers or renters decision, but none is so determinate as cost, particularly to the low or moderate income consumer. In the field of sales-housing and rentals it thus becomes important to establish minimum room space standards.

For reasons to be developed later, one Federal housing program has maximum space standards. This is the low-rent public housing program of the Housing Assistance Administration. In all other instances, space standards are set as minimums. Various agencies of government and various levels of government--local, state, and national as well as private trade associations

have minimum building and housing space standards, as well as a host of other minimums in terms of plumbing, electrical and other codes. However, here we are concerned with space standards; size of rooms and number of rooms by function.

The Federal government through its many agencies and departments sets minimum housing standards. The State of California has established certain minimums in the California Health and Safety Code and counties and municipalities have certain minimum standards either by reference to uniform building codes, or actually spelled out in ordinances in addition to which a new kind of "floating" minimum is used by many municipalities called "architectural control" by which minimum standards may be further modified. Enforcement of established standards is often uneven, and sometimes not done at all.

Minimum Property Standards

The Federal Housing Administration (FHA) has for many years published a set of building and housing standards known as minimum property standards. These standards with slight regional modifications are applied all over the United States to dwellings on which mortgage insurance is sought from FHA. Because of the nationwide use of FHA mortgage insurance, the published standards have strongly influenced the building industry despite the fact that only about 1/3 of all new mortgages are actually insured by FHA. The effect has been a substantial standardization in dwelling construction.

FHA standards are published for a number of types of buildings, detached as well as multiple and walkup as well as elevator highrise. Using the designation "property standards" makes possible the combining of both "housing" and "building" standards under one heading, a real convenience

since it is often difficult to determine which term is more appropriate in any particular instance involving as it may both materials and design. Other terms such as "dwelling requirements" or "uniform code", etc., are used to cover both regulations setting minimum standards for new construction (building codes) and minimum standards as to the condition, occupancy, and maintenance of existing premises (housing codes).

The FHA requirements for low-income housing are set forth in a publication "Minimum Property Standards for Low Cost Housing" FHA 4515.1, while the requirements for low rent public housing are covered in "Low Rent Housing Turnkey Handbook" RHA 7420.1. The minimum California State requirements are given in a condensed form in a pamphlet "Dwelling Requirements" published by the California Department of Housing and Community Development. Another set of standards widely recognized is "Standards for Healthful Housing" of the American Public Health Association Committee on the Hygiene of Housing.

The FHA Minimum Property Standards for one and two living units, and for multifamily housing sets forth the requirements under which the majority of new housing in Santa Clara County as well as the rest of the country has been built. A comparison of these various standards reveals some significant differences as well as many similarities.

Table I provides a comparison of certain essential space elements between the "Dwelling Requirements" of the California State Housing Law, the "Standards for Healthful Housing" of the American Public Health Association, the "Minimum Property Standards" of FHA for "One and Two Living Units," "Multifamily Housing" and for "Low Cost Housing" living units, and finally "Planning and Design Criteria for Housing for Low-Income Families by the Turnkey Method" as given in "Low Rent Housing Turnkey Handbook." RHA 7420.1.

To make direct comparisons possible between the minimum space standards of FHA, the maximum space standards of Public Housing requirements and the "healthful housing" standards of the American Public Health Association, some assumptions must be made. The standards of A.P.H.A. and the Public Housing standards are stated in total space requirements for the dwelling unit, including bathrooms, general storage space, etc. The FHA minimums are given room by room, but provide no space requirement for bathrooms. By totaling the individual room figures including an estimated figure for the bathroom, a good approximation of total space requirements is obtained for the three FHA standards. Table II compares the total dwelling space figures, assuming a requirement of 35 square feet of bathroom space for all FHA units except the low income which is 33 square feet. Chart I presents the same information in graphic form.

It is evident from examination that the space standards recommended by the American Public Health Association require substantially greater square footage than those of HUD and FHA and would of necessity involve greater costs for construction. The rationale behind these standards is worth examining because of the different square footage figures which result.

TABLE I

MINIMUM OR MAXIMUM SPACE REQUIREMENTS IN DWELLING UNITS

California Health and Safety Code

American Public Health Association

Federal Housing Administration and Housing Assistance Administration

HUD

AGENCY	SPACE REQUIREMENTS
California State "Dwelling Requirements"	Efficiency Unit, minimum 220 square feet. Not less than 120 square feet in at least one room of dwelling. Bedroom minimum of 90 square feet. Kitchen minimum 50 square feet. 7' minimum horizontal and 7'6" minimum height. Window area not less than 12 square feet or 1/8 of floor area, if greater.
American Public Health Association "Standards for Healthful Housing"	Minimum space per PERSON for: Living room - 125 square feet Bedroom - 74 square feet Dining room - 34 square feet Bathroom - 35 square feet Laundry - 36 square feet Kitchen - 38 square feet Storage - 48 square feet

MINIMUM FLOOR SPACE FOR 10 BASIC HOUSEHOLD ACTIVITIES

Number of persons and square feet required					
1	2	3	4	5	6
380	765	989	1159	1420	1550

FHA MINIMUM
PROPERTY
STANDARDS
for

MINIMUM SPACE IN SQ. FT.
NUMBER OF BEDROOMS

a. Multi-family b. Housing for One and Two Living Units c. Low-Cost Housing	ROOM USE	TYPE OF DWELLING	NUMBER OF BEDROOMS				LEAST DIMENSION
			1	2	3	4	
	Bed-room	a. Multi-family	120	200	280	380	8'
		b. One & Two	120	200	280	380	8'
		c. Low Cost	110	180	250	320	7'
	Living-room	a. Multi-family	160	160	170	180	12'
		b. One & Two	160	160	170	180	11'
		c. Low Cost	140	140	150	160	11'
	Dining-room	a. Multi-family	100	100	110	120	8'4"
		b. One & Two	80	80	95	110	8'
		c. Low Cost	80	80	90	100	8'
	Kitchen	a. Multi-family	60	60	70	80	5'4"
		b. One & Two	60	60	70	80	3'4"
		c. Low Cost	50	50	60	70	3'
	Closets	a. Multi-family	16	22	28	34	2'
		b. One & Two	14	20	26	32	2'
		c. Low Cost	5½	11	16½	22	1'10"

MINIMUM SPACE IN SQ. FT.
NUMBER OF BEDROOMS

ROOM USE	TYPE OF DWELLING	1	2	3	4	LEAST DIMENSION
General Storage (Cu.Ft.)	a. Multi-family	150	200	250	300	2'
	b. One & Two	275	350	425	500	2'6"
	c. Low Cost	100	150	200	250	1'
Drawer Counter-top & Shelf area	a. Multi-family	84	84	96	96	4'
	b. One & Two	72	72	72	72	4'
	c. Low Cost	42	42	42	42	4'

Low-Rent
Housing
Turnkey
Handbook
RHA 7420.1
Appendix No. 6

No specific minimum individual room space requirements are provided. However, a Maximum Combined Space figure is provided which includes storage space. The Maximum space per unit in square feet for general occupancy is as follows:

Number of bedrooms and square feet						
1	2	3	4	5	6	
550	720	900	1120	1320	1540	

For occupancy by the elderly the comparable figures are:

Number of bedrooms and square feet		
0	1	2
400	525	700

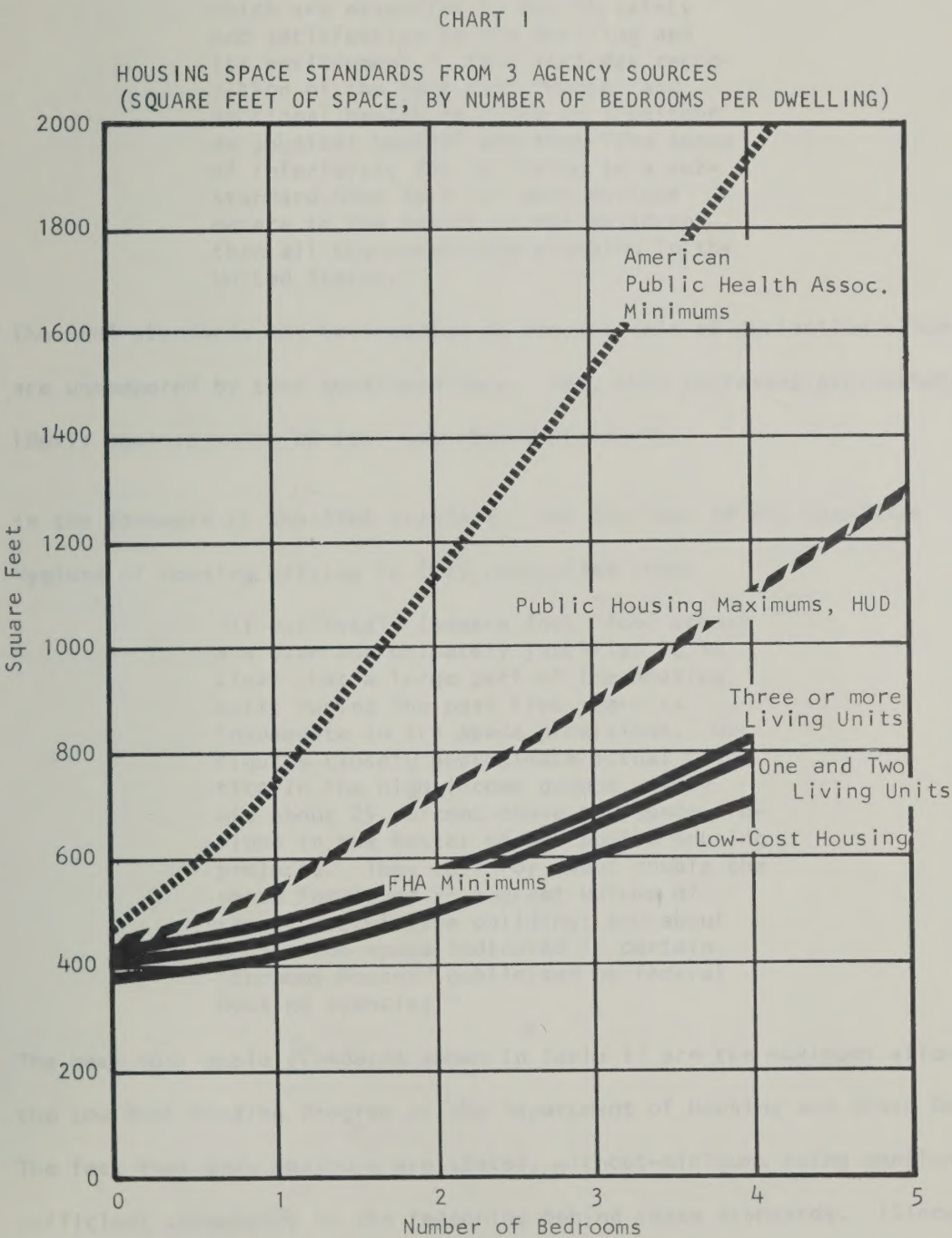
TABLE 11

HOUSING SPACE STANDARDS FROM 3 AGENCY SOURCES

Number of Bedrooms		AGENCY				
		APHA ¹	RHA ²	Multi- family ³	FHA One & Two ⁴	Low-Cost ⁵
One	Sq. Ft. Percent ¹⁰	750 100	550 73	497 ⁶ 66	473 ⁷ 63	420 ⁸ 56
Two	Sq. Ft. Percent ¹⁰	1150 100	720 63	583 51	559 49	495 43
Three	Sq. Ft. Percent ¹⁰	1550 100	900 58	699 45	680 44	601 39
Four	Sq. Ft. Percent ¹⁰	1950 ⁹ 100	1120 57	835 43	821 42	706 36

1. STANDARDS FOR HEALTHFUL HOUSING, American Public Health Association Committee on the Hygiene of Housing, Public Administration Service, 1950.
2. LOW-RENT HOUSING TURNKEY HANDBOOK, RHA 7420.1 Appendix 6, p. 10, Department of Housing and Urban Development, 1969.
3. MINIMUM PROPERTY STANDARDS FOR MULTIFAMILY HOUSING, FHA 2600 Department of Housing and Urban Development, 1969.
4. MINIMUM PROPERTY STANDARDS FOR ONE AND TWO LIVING UNITS, FHA 300 Department of Housing and Urban Development, 1966.
5. MINIMUM PROPERTY STANDARDS FOR LOW-COST HOUSING, A HUD Handbook, FHA 4515.1 Department of Housing and Urban Development, 1968.
6. This figure includes 35 square feet for bathroom (estimated) 10 square feet for the first closet and 6 square feet for subsequent closets, 6 square feet for a coat closet, 2 square feet for linen closets and 4 square feet for general storage.
7. The figures in this column include 35 square feet for a bathroom (estimated), 6 square feet for a coat closet and an additional 6 square feet for a closet in each bedroom, plus 1-3/4 square feet for linen closet and 4-1/2 square feet for general storage. The last two figures, combined, are rounded to 6 square feet.
8. The figures in this column include 33 square feet for a bathroom (estimated), 5.5 square feet for each bedroom closet, (no coat closet is required) and 1.36 square feet for a linen closet and no minimum floor area required for general storage. The two fractional square footages are rounded to the nearest whole figure 7, 12, 18, and 23 respectively for 1 to 4 bedrooms.
9. This figure is not shown in the publication cited, but represents an extrapolation of the figures for 2 and 3 bedrooms, each of which is 400 square feet greater than the next smaller. The APHA figures increase by 400 square feet for each new bedroom added, up to 3 where they stop. The figure shown represents the 3-bedroom figure plus 400 square feet.

10. The APHA standards represent 100%. Each of the other figures is stated as a percentage of the APHA figure for that size unit.



The APHA standards are arrived at on the basis of the:

"Conviction that the home is primarily an instrument of health..." and they are the "standards of actual performance which are essential to health, safety and satisfaction in the dwelling and its environment." This includes recognition of the fact that "mental and emotional health is quite as important as physical health" and that "The sense of inferiority due to living in a sub-standard home is a far more serious menace to the health of our children than all the unsanitary plumbing in the United States."

The APHA standards may be regarded as the counsels of perfection since they are unhampered by cost considerations. Yet, they represent approachable ideals against which to test cost-bound standards.

In the foreword to the APHA standards, the Chairman of the Committee on the Hygiene of Housing, writing in 1949, recognizes that:

"If our totals (square foot floor areas) are even approximately justified it is clear that a large part of the housing built during the past five years is inadequate in its space provisions. Our figures closely approximate actual practice in the high-income groups. They are about 25 percent above the space provided in the better of our public housing projects. They call for about double the space furnished in a great volume of recent speculative building; and about double the space indicated in certain "Economy Houses" publicized by federal housing agencies."

The next most ample standards shown in Table II are the maximums allowed in the Low Rent Housing Program of the Department of Housing and Urban Development. The fact that only maximums are stated, without-minimums being mentioned, is sufficient commentary on the reasoning behind these standards. (Since this was written FHA has announced that its MPS will apply to all new Public Housing structures.)

They apply to "Public Housing" for poor people, not for sales or investment rental housing, and consequently "marketability" is not a factor. Moreover a maximum dollar limit per room which may be spent on construction is written into the enabling legislation.

The space maximums for public housing units are greater than the FHA minimums for comparable bedroom size units, but cannot be exceeded, whereas FHA units commonly exceed the minimums stated. In short, Public Housing is to be built:

"...in an economical manner and not be of elaborate or extravagant design or materials. Planning and design should particularly consider livability, safety, and a selection of materials and equipment to keep maintenance, operation, and replacement cost at a minimum for at least 40 years." (emphasis added)

A duller, more utilitarian approach to housing standards would be hard to find. Unfortunately, it reflects the bureaucratic response to congressional attitudes about housing for low-income people. Subsequent statements in the Handbook attempt to leaven the subject with admonishments such as:

"In the administration of housing programs which assist in the provision of housing for low and moderate income families, emphasis should be given to encouraging good design as an essential component of such housing and to developing housing which will be of such quality as to reflect its important relationship to the architectural standards of the neighborhood and community in which it is situated, consistent with prudent budgeting."

No amount of exhortation to builders or developers to "develop new or better solutions to the problem of housing low-income people" can overcome the absolute dollar limits set by Congress placed on construction costs on one hand, and the repeated emphasis on low maintenance operation and replacement costs on the other, even though the "maximum" space limits appear generous by comparison with FHA program's "minimums."

The next set of housing standards shown in Table II are those which apply to 3 different classifications established by FHA all with mortgage loan insurance in mind. The first column under the FHA heading gives the minimum total square footage of units in multifamily housing; principally apartment houses. The second column gives the minimum square footage for structures containing 1 or 2 living units, meaning detached tract houses, and duplexes. The last column gives the square footage for a category of housing referred to by FHA as "Low-Cost." This refers to certain specific federal housing programs under the National Housing Act as follows:

- a. Single family properties having a detached dwelling under section 203 (1).
- b. Single family properties under sections 203(b), 203(h), 220(d) (3) (A) and 222 where the mortgage amount does not exceed the maximum amount insurable under section 203(i).

So far as is known, no projects to which these standards are applicable have been built in Santa Clara County.

The multifamily and 1 and 2 living unit space standards are quite similar, with the multifamily being slightly greater because of a larger dining room area and more closet space in the first bedroom. But between these standards and those for low-income housing there is a substantial difference. The character of the differences may be found in the foreword to the Minimum Property Standards for Low Cost Housing, which states:

"The quality of housing acceptable under these standards is somewhat below that of the Minimum Property Standards for 1 and 2 Living Units in several respects. The principal relaxations involve planning standards where aspects of shelter over convenience predominate.... The standards do not attempt to provide an absolute minimum degree of shelter, structural strength, or durability. In the development of these standards, emphasis has been placed upon those characteristics which will assure housing that is structurally sound and durable, has reasonably low future maintenance, and is well planned for the needs of the occupants."

The space difference by bedroom size between what has been thought necessary to gain acceptance in the general housing market on the one hand (one and two living units) and on the other what poor people will accept (Low-Cost Housing) varies from 53 square feet in a one bedroom unit, to 115 square feet in a four bedroom unit, or an average of about 12 percent less. Not only is there less room space under the Low-Cost Minimum Property Standards, but a number of normal items are left out such as doors for closets and cupboards, and specific general storage space; all required in FHA mortgage insured housing except for low-income housing. Living space is reduced in low-cost housing to only 88 square feet per person in the four bedroom unit, whereas the APHA standard provides for an ample 244 square feet per person in a four bedroom unit. Thus, the average space per person in the APHA standard is greater in the four bedroom house than the space per person in the one bedroom "Low-Cost house". The reason given for reducing space dimensions for Low-Cost housing is to reduce the cost of housing and in this fashion make housing available to a lower income group of consumers than is possible using the standards set out for "One and Two living units". However, reducing minimum space requirements increases crowding and intensity of use, with this dollar savings overall relatively insignificant in the total housing cost consideration. Neither site cost nor interest rate is reduced by reducing housing space. The 15 percent space difference between a three bedroom unit built to "One and Two Living Unit" standards and a three bedroom unit built to "Low-Income Housing" standards results only in a 10 percent reduction in typical monthly loan repayment costs.

Assuming 25 percent as an acceptable proportion of income allocable to shelter cost, the difference in annual income needed to amortize the principal and interest, property taxes and insurance costs on a three bedroom house built to regular, as compared to low-cost FHA standards, amounts to only \$570.00.

It is thus clear that reducing costs of housing by reducing housing space within the ranges used by FHA in its minimum property standards makes insured loans available to only a very narrow range of additional low income housing consumers. The minimal structures that result are apt to be looked upon unfavorably by both their occupants and the community. It is small wonder that the "Low-Cost Housing" standards have been used but little, and in many areas not at all.

The square footage minimums of FHA as noted above, are based on a "marketability" concept, which is to say that FHA since it insures mortgage loans on dwellings, wants to be able readily to dispose of any units it is forced to repossess because of default in payments by the mortgagor. Obviously spaciousness is a factor in marketability, and as emphasized in the statement of "purpose" of the Minimum Property Standards for one and two living units,

"Planning and Construction which exceed the minimums set forth herein and which will result in increased marketability of the property or which will reduce the expense of maintenance or early replacement of equipment will be reflected in the FHA estimate of value."

In contrast, the element of marketability is not even considered in the planning and design criteria of the Public Housing programs of the Department of Housing and Urban Development which emphasize durability and low maintenance and operation costs in view of the 40 year term of the bond repayment period. Because low monthly rental rates is an objective and because the funds available are limited in amount, there are maximum limits set on both space and on the dollar amount allowed per room for construction and equipment. The latter figure (\$2,800.00) is established by Congress. No specific unit cost limit is given for scattered Turnkey projects and it is possible that an averaging process with some units costing more and some less might be used.

Since very few mortgages are guaranteed by FHA for more than 30 year terms, in a sense 30 years is all an FHA insured house has to be designed for. Durability is thus less of a factor than it is in the 40 year amortized Public Housing Program. Pleasing design and adequate space in a dwelling unit are not necessarily in conflict with durability and low maintenance cost, but where conflict arises, elements that contribute to durability and low maintenance cost have always won out over any other considerations in public housing. The Rural housing programs of the Farmers Home Administration (FmHA) apply to FHA standards to the dwelling they finance. This is particularly true under the 235 and 236 programs. "Marketability" is an important factor for FmHA since they too seek to resell any foreclosed properties.

CONCLUSIONS:

Comparison of the explicit housing space standards established by FHA for dwelling units under its mortgage insurance programs, the standards of the Housing Assistance Administration for dwellings under the Public Housing Program, and the "Standards for Healthful Housing" of the American Public Health Association shows ambivalent if not contradictory views as to what public policy should be in this important matter.

Since there is a high positive correlation between dwelling unit space and dwelling unit cost, at some point an upper limit on dwelling space in a unit is set by sheer cost. There is also a lower limit on dwelling space in a unit set by function, and by other considerations as well, particularly in urban settings. Somewhere between these upper and lower limits lies an optimum, which varies according to circumstance. For the private person

or family of ample means, the optimum permits inclusion of more space than does the optimum for the person or family of moderate means, and eventually a point is reached where a person or family of small means needs assistance to obtain housing providing even functionally minimal space.

We need not concern ourselves about the first case above because by definition, adequate income provides the basis for exercise of market choice. The second case, however, is of concern since it accounts for a very large number of persons and families who place increasing emphasis on cost considerations as one goes down the income scale. This group is of concern particularly toward the lower end of its income range because it is there that the strongest pressure to reduce space in order to reduce cost is exerted. This group is the one to which FHA programs are principally directed and which accounts for most of the new housing construction.

Below this middle or moderate income group and merging imperceptibly with it are the low-income persons and families who often do not qualify for FHA guaranteed mortgages at all because of income limitation and poor credit ratings. Choice of housing for members of this last group is greatly restricted and many families are found in substandard housing with over-crowded conditions and exorbitant rents. From this group of low income persons and families come the tenants of the Housing Authorities in "Public Housing" and the tenants of various low-rent programs of HUD. It is this low-income group which is most subject to bureaucratic determinations and interpretations of housing space minimums set forth in Congressional policy.

In public housing overcrowding is theoretically not permitted, whereas in private low-income housing it is commonplace. Space standards of design in

low-income housing are really only effective in public housing because in privately owned low-income housing, occupancy standards are more honored in the breach than in the observance. Hence, originally well planned spacious dwellings often are overcrowded when occupied by low-income renters despite the continuous efforts of Health or Housing Departments to reduce overcrowding.

New housing units built to FHA standards for low-income occupancy, particularly in the large bedroom sizes, are niggardly with space, and downright impoverished in the "Low-Cost" category. This is particularly true of storage space. Apparently low-income families are assumed to have few "things" and to require less storage than more affluent families. In fact, low-income families often accumulate and hold on to things beyond immediate needs. Having room to store food stuffs bought in quantity is one of the important ways that savings can be accomplished by any family, yet storage space is actually reduced in "Low-Cost" housing standards compared to "Moderate Cost" standards, both in the kitchen and in general storage, thereby circumscribing low-income families opportunities to save.

The maximum space figures in public rental housing (not to be exceeded) must include "all tenant storage area, whether inside or outside the unit." This requirement coupled with maximum per room costs, very much limits storage space in Public Housing construction leading directly to trash and garbage disposal problems in operating programs.

As long as the Congress lays down statutory dollar limits on individual items or total costs per dwelling unit in order to extract the greatest number of units per hundred thousand dollars of appropriations, the response will emphasize quantity of units rather than quality of housing for those housed. The

resulting structures and units will tend toward being warehouses for the poor rather than dwellings and homes for people. The congressional concept of "modest design and cost" when translated into actual buildings almost always turns out to be dull and disappointing, but "standard".

The minimum space standards of FHA for "Low-Cost" housing are far too low for "livability" and should be abandoned. The minimum space requirements of the FHA "Minimum Property Standards" for "One and Two Living Units" should be increased to and combined with those for FHA multifamily housing to establish the minimum dwelling space requirements for any federally assisted program for housing, private or public, urban or rural, high-income or low-income. These should become the absolute floor under any federally assisted housing, and hopefully unassisted housing for low-income families and persons, through adoption in the housing codes of municipalities and counties (at present the San Jose housing code has a minimum of 49 square feet for habitable rooms, the Uniform Building Code (UCB) of 1964 used by the County requires 80 square feet for bedrooms and, as noted above, the California Health and Safety Code and the UCB of 1967 calls for 90 square feet for bedrooms and 50 square feet for kitchens).

The dwelling space standards for Public Housing dwelling units should be stated as minimums instead of maximums, permitting them to be exceeded where possible but not permitting downgrading. The limits set by the absolute dollar per room costs allowed clearly precludes any lavish or extravagant design so feared by critics of Public Housing.

RECOMMENDATIONS

1. Adoption by the State of California of the Uniform Building Code (UBC) of 1970 Volume III, requirements as part of the Health & Safety Code, Division 13 Part 1.5.
2. Vigorous enforcement of the provisions of the State Health & Safety Code regarding minimum space requirements for new construction and rehabilitation. Enforcement is the duty of the Public Works and Health Departments of county and municipal governments in California.
3. Adoption by the County and the municipalities in the County of the UBC 1970 Volume III "Housing" as minimum standards, supplemented by FHA standards for those elements not covered by UBC, thus fostering uniformity of requirements within and throughout the County.
4. Adoption by FHA of a single set of space standards through combining the present "Multifamily" and "One and Two Living Units" minimum property standards, and abandonment of the "Low-Cost Housing" standards. With minimum requirements applicable regardless of the program number or the income of the mortgagor.
5. Adoption by the Housing Assistance Administration or its successor of the Uniform Building Code of 1970 Volume III "Housing".
6. Adoption by FHA of the "General Storage" standards for One and Two Living Units, as the minimum for all programs.
7. Establishment of a National Institute of Environmental Sciences; one of whose duties would be the continuing evaluation and promulgation of a National Housing Code which includes Room and Space standards.

U.C. BERKELEY LIBRARIES



C094825233

